



Alaska Trollers Association

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Country of Origin Labeling Program

Room 2092-S

Agricultural Marketing Service

USDA Stop 0249

1400 Independence Ave SW

Washington DC 20250-0249

RE: Docket No. LS-03-04 - Country of Origin Interim Final Rule

The Alaska Trollers Association (ATA) supports the labeling of seafood products for country of origin, as well as distinguishing between wild and farm raised. Unfortunately, the interim rule is selective in its application of such labels, which we do not believe is in keeping with the original intent of Congress when it considered and passed the law.

ATA represents hook and line salmon fishermen operating off the coast of Alaska. Our organization has long supported reasonable labeling programs as a means to provide consumers with information they need and want to make informed choices about the foods they eat. Country of Origin Labeling (COOL) is a substantial step toward that end.

As it stands, the interim rule would exempt from labeling the majority of the US salmon pack, simply because the USDA has chosen to omit, among others, canned, smoked, and cured seafood products from the list of covered commodities. The USDA considers those foodstuffs to be "processed". While much of Alaska's seafood is canned and smoked, it is not significantly altered and still retains its natural characteristics. It is difficult to believe that such items are what most people consider "processed food" - as they would the protein in some TV dinners, or other products that are blended with other foods, sauces, or chemicals. That said, to many consumers calling for labeling, it does not appear to matter whether or not the product is processed or blended. Perhaps a solution would be to set a minimum standard for labeling that involves the percentage of seafood included in "processed" products.

Consumers are becoming much more discerning when it comes to selection of seafood, but in the marketplace it is often hard to distinguish where it comes from or how it is harvested. This is becoming increasingly difficult as a greater number of species are being raised in more countries around the world. Labeling will provide a service to those people who care to know.

The interim rule also contains some bad information. It states:

...a retailer that receives fresh wild salmon from Alaska in January should have known that such a declaration was inaccurate. (p.59717)

In fact, ours is the only fleet in the state that can land salmon in every month of the year. Additionally, our winter fishery runs October to April and nearly all the product is sold fresh.

While ATA strongly supports labeling of seafood, we also appreciate some of the concerns that have been expressed by those who will have to implement the program. Therefore, we support working with others in the food service industry, state and federal agencies where necessary, to ease unnecessary burdens and avoid duplicative efforts. This may be especially important given the new Homeland Security Act.

ATA appreciates the opportunity to comment on the COOL interim final rule. Please don't hesitate to contact our office if we can be of assistance on this or other matters of concern to the seafood industry.

Best Regards,

A handwritten signature in black ink that reads "Dale Kelley". The signature is written in a cursive, flowing style.

Dale Kelley
Executive Director